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March 7, 2011

Mr. Jeff Derouen
Executive Director
Public Service Commission
Post Office Box 615
Frankfort, Kentucky 40602

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PUBLIC SER

COMMISSION

Re: Case No. 2011-00036

Kenergy Corp. – Motion to Intervene

Dear Mr. Derouen:

Enclosed you will find the original and three (3) copies of Kenergy's Motion to Intervene in the above case.

Your assistance in this matter is appreciated.

Very truly yours,

DORSEY, KING, GRAY, NORMENT & HOPGOOD

By

J. Christopher Hopgood Counsel for Kenergy Corp.

JCH/cds Encls.

COPY/w/encls:

Hon. Michael L. Kurtz

Hon. James M. Miller

Hon. Douglas L. Beresford Hon. David C. Brown

## **COMMONWEALTH OF KENTUCKY**

RECEIVED BEFORE THE PUBLIC SERVICE COMMISSION PUBLIC SERVICE

In the Matter of:

THE APPLICATION OF BIG RIVERS) **ELECTRIC CORPORATION FOR GENERAL ADJUSTMENT IN RATES)** 

CASE NO. 2011-00036

## MOTION TO INTERVENE OF KENERGY CORP.

Comes **KENERGY CORP.** ("Kenergy"), by counsel, and moves the Commission for entry of order allowing it full intervention in this proceeding pursuant to 807 KAR 5:001 §3(8). In support of this motion, Kenergy states:

- 1. Kenergy is a rural electric cooperative corporation organized pursuant to KRS Chapter 279. Kenergy's mailing address is Post Office Box 18, Henderson, Kentucky 42419-0018. Kenergy is a retail electric supplier as defined under KRS 278.010(4) and is one of the three (3) member-owners of Big Rivers Electric Corporation ("Big Rivers").
- 2. Kenergy is a member-owner of Big Rivers and a distributor of energy produced by Big Rivers has an interest in ensuring that the rates charged by Big Rivers are

just and reasonable. Granting full intervention to Kenergy will not unduly complicate or disrupt this proceeding.

- 3. If Kenergy is granted full intervention in this proceeding, service of all documents required to be served on all parties should be made on the following persons:
  - Sanford Novick
    President and CEO
    Kenergy Corp.
    Post Office Box 18
    Henderson, Kentucky 42419-0018
    Telefax: 270-826-3999
  - J. Christopher Hopgood
     Counsel for Kenergy Corp.
     318 Second Street
     Henderson, Kentucky 42420
     Telefax: 270-826-6672

WHEREFORE, Kenergy respectfully requests that the Commission make its order granting Kenergy full intervention in this proceeding, and Kenergy further request that it be granted all proper relief.

DORSEY, KING, GRAY, NORMENT & HOPGOOD 318 Second Street Henderson, Kentucky 42420 Telephone 270 - 826-3965 Telefax 270 - 826-6672 counsel for Kenergy Corp.

J. Christopher Hopgoo

The foregoing was served by mailing a true and correct copy, postage paid, upon the following, on this \_\_\_\_\_\_ day of March, 2011:

Hon. Michael L. Kurtz Counsel for KIUC Boehm, Kurtz & Lowry 2110 CBLD Center 36 East Seventh Street Cincinnati, Ohio 45202

Hon. James M. Miller
Hon. Mark Willis
100 St. Ann Street
Post Office Box 727
Owensboro, Kentucky 42302-0727
of counsel for Big Rivers Electric Corporation

Hon. Douglas L. Beresford 555 13<sup>th</sup> Street, NW Washington, D. C. 20004-1109 of counsel for Big Rivers Electric Corporation

Hon. David C. Brown Stites & Harbison 1800 Providian Center 400 West Market Street Louisville, KY 40202

of counsel for Kenergy Corp